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Erle Lockhart
Lockhart Farms
4147 E 900 S
Walton, IN 46994

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DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT
OFFICE OF LAND QUALITY

#09-615(WPCB) [CFO Rulemaking]
Janet Pittman
Rules Development Branch
Office of Legal Counsel
Indiana Department of Environmental Management
100 North Senate Avenue MC 65-46
Indianapolis, Indiana 46204-2251

Comments Regarding #09-615(WPCB)[CFO Rulemaking]:

I would like to present IDEM with a few remarks in regard to issues I have with the CFO draft rule.

Manure Application Setbacks: The proposed setback requirements are very concerning. Why is IDEM changing from the setbacks found in the current rule? A distinction must be made between injection and other methods of applying manure since injection has less environmental risk. IDEM should retain its current setback table.

Nitrogen: It is common sense that Nitrogen is lost in manure application, especially when surface applied. Pork producers should be able to make allowances for this. Purdue has information on this subject and that information should be used by IDEM to create a way to account for N loss.

Phosphorus: For smaller, independent producers, changing from a Nitrogen based land application standard to one that is Phosphorus based could mean big changes in how manure is handled. The phase in period in the draft rule is not a realistic way to approach this problem. Producers will need more time to implement these changes, especially when IDEM is essentially recommending doing nothing at all for the first three years of the proposed six year phase in.

Thank you for the opportunity to comment.



Erle Lockhart
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